

3. Defendants intend to offer an exhibit that addresses confidential mental health care implications for the Plaintiff, and requests that they be able to file the document under seal. The Document will be Exhibit H to Defendants supporting Brief
4. Defendants have not discussed this matter with Plaintiff, but presumes she would consent.

Wherefore Defendants request that Exhibit H to Defendants Supporting Brief be filed under seal.

Respectfully submitted,

Attorneys for Defendants,

/s/Michael E Kennedy

Michael E Kennedy

Deputy Attorney General

PA ID 52780

OFFICE OF ATTORNEY GENERAL

6th Floor, Manor Complex

564 Forbes Avenue

Pittsburgh, PA 15219

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion and the proposed court order were served upon the Plaintiff on November 16 2017, by first class US mail to her record address:

3342 west 12th street, Erie PA 16505.

Attorneys for Defendants,

/s/Michael E Kennedy

Michael E Kennedy

Deputy Attorney General

PA ID 52780